



# ecology and environment, inc.

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International Specialists in the Environment

## MEMORANDUM

DATE: August 25, 1988

TO: John Osborn, FIT-RPO, USEPA, Region X

THRU: Jeffrey Villnow, FIT-OM, E&E, Seattle *977*

FROM: Gerald Lee, FIT-SM, E&E, Seattle *BL*

SUBJ: Site Inspection Reassessment/  
Preliminary HRS Score for  
Scott Paper Company  
Everett, Washington

REF: TDD F10-8806-08  
PAN F10Z062SA

CC: William Glasser, HWD-SM, USEPA, Region X  
David Bennett, HWD, USEPA, Region X  
John J. Roland, FIT-PM, E&E, Seattle

A file review for Scott Paper Company has been conducted to assess the previously conducted Site Inspection (SI) and to develop a preliminary HRS score. Using the file, and additional information, a preliminary HRS score of 13.79 was calculated based on the following information:

- o Scott Paper Company is an active facility which has manufactured sulfite pulp paper products since the early 1960s. In 1980 through 1981 the facility burned rubber products in the hog fuel boilers, producing approximately 2,525 cubic yards of zinc-laden (4.5 ppm) ash. This ash was deposited in an unlined landfill on site. In July 1981, 2,000 gallons of concentrated sulfuric acid was accidentally discharged into Port Gardner Bay and Scott Paper Company was subsequently find \$2,000.00 by the Washington Department of Ecology. The facility has filed for a RCRA Part A permit and is currently classified as a small generator. Access is limited by fences and gates which surround the facility.

USEPA SF



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SI Reassessment/Preliminary HRS Score for  
Scott Paper Company  
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- o There are no reported observed releases to ground water or air.
- o Depth to the aquifer of concern is less than 20 feet below ground surface. The ground water is used by one household 2.5 miles away. No other users of this aquifer were identified within three miles of the facility.
- o The 2,525 cubic yards of hog fuel ash containing zinc maximized the toxicity/persistence and the hazardous waste quantity values.
- o An observed release to surface water was used to score the site as a result of the discharge of 2,000 gallons of sulfuric acid to Port Gardner Bay in 1981. This area is used for commercial fishing and crabbing.
- o There are no known sensitive environments (wetlands or endangered species habitats) within two miles of the site and there is no drinking water population served by surface water within three miles.

Additional information will most likely not result in a higher score. Based on information available in the site file, this facility does not appear to present any immediate problems to the surrounding area. In addition, the facility should eventually be covered by RCRA permit regulations. Therefore, no further work under CERCLA/SARA is recommended at this time.

Using information available at this time, scoring this site under HRS II guidelines could increase the final score slightly via the sensitive environment and recreational use sections.

GL:rls

Facility name: Scott Paper Co  
Location: Everett, WA  
EPA Region: X  
Person(s) in charge of the facility: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Name of Reviewer: J. LEE (E&E) Date: 7-12-88  
General description of the facility:

(For example: landfill, surface impoundment, pile, container; types of hazardous substances; location of the facility; contamination route of major concern; types of information needed for rating; agency action, etc.)

Scott Paper Co. manufactures sulfite pulp paper products. In 1981 they burned rubber products in the hog fuel boilers, producing approximately 2525 yds<sup>3</sup> of zinc laden (~4.5 ppm) ~~ash~~ ash. Solvents were also burned in these boilers periodically since they began operations in ~~the~~ the early 1960's. In 1981 2000 gallons of sulfuric acid were discharged to Port Gardner and Scott Paper Co was fined \$2000.00.

Scores: S<sub>M</sub> = 13.79

S<sub>FE</sub> =

S<sub>DC</sub> =

HRS COVER SHEET



No observed release

< 20 feet  
9 inches  
fill  
Ash

Landfill - not lined

Zinc  
2525 yds<sup>3</sup>

Domestic well  
Approx. 2 1/2 miles serves  
1 household

Ground Water Route Work Sheet						
Rating Factor	Assigned Value (Circle One)	Multi-plier	Score	Max. Score	Ref. Section	
1 Observed Release	0	45	1	0	45 3.1	
If observed release is given a score of 45, proceed to line 41. If observed release is given a score of 0, proceed to line 21.						
2 Route Characteristics					3.2	
Depth to Aquifer of Concern	0 1 2 3	2	6	6		
Net Precipitation	0 1 2 3	1	2	3		
Permeability of the Unsaturated Zone	0 1 2 3	1	2	3		
Physical State	0 1 2 3	1	2	3		
Total Route Characteristics Score			12	15		
3 Containment	0 1 2 3	1	3	3	3.3	
4 Waste Characteristics					3.4	
Toxicity/Persistence	0 3 6 9 12 15 18 21	1	18	18		
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 8 9	1	8	8		
Total Waste Characteristics Score			26	26		
5 Targets					3.5	
Ground Water Use	0 1 2 3	3	9	9		
Distance to Nearest Well/Population Served	0 1 2 3 4 5 6 7 8 9 10 12 16 18 20 24 30 32 35 40	1	4	40		
Total Targets Score			13	49		
6 If line 11 is 45, multiply 11 x 4 x 3 If line 11 is 0, multiply 11 x 2 x 3			13168	57,330		
7 Divide line 6 by 57,330 and multiply by 100			S <sub>W</sub> = 21.22			

GROUND WATER ROUTE WORK SHEET

Sulfuric Acid spill to  
Port Gardner Bay 7-5-81

Zinc-laden ash  
2525 yds<sup>3</sup>

commercial crabbing/fishing  
None w/in 2 miles

Surface Water Route Work Sheet						
Rating Factor	Assigned Value (Circle One)		Multi-plier	Score	Max. Score	Ref. (Section)
<b>1</b> Observed Release	0	45	1	45	45	4.1
If observed release is given a value of 45, proceed to line <b>4</b> . If observed release is given a value of 0, proceed to line <b>2</b> .						
<b>2</b> Route Characteristics						4.2
Facility Slope and Intervening Terrain	0	1 2 3	1		3	
1-yr. 24-hr. Rainfall	0	1 2 3	1		3	
Distance to Nearest Surface Water	0	1 2 3	2		6	
Physical State	0	1 2 3	1		3	
Total Route Characteristics Score					15	
<b>3</b> Containment	0	1 2 3	1		3	4.3
<b>4</b> Waste Characteristics						4.4
Toxicity/Persistence	0	3 6 9 12 15 18	1	18	18	
Hazardous Waste Quantity	0	1 2 3 4 5 6 7 8	1	8	8	
Total Waste Characteristics Score				26	25	
<b>5</b> Targets						4.5
Surface Water Use	0	1 2 3	3	6	9	
Distance to a Sensitive Environment	0	1 2 3	2	0	6	
Population Served/Distance to Water Intake Downstream	0	4 6 8 10 12 15 18 20 24 30 32 35 40	1	0	40	
Total Targets Score				6	55	
<b>6</b> If line <b>1</b> is 45, multiply <b>1</b> x <b>2</b> x <b>3</b> <b>7</b> If line <b>1</b> is 0, multiply <b>2</b> x <b>3</b> x <b>4</b> x <b>5</b>				7020	54 350	
<b>8</b> Divide line <b>6</b> by 64,350 and multiply by 100				S <sub>FW</sub> = 10.91		

SURFACE WATER ROUTE WORK SHEET



None

Air Route Work Sheet						
Rating Factor	Assigned Value (Circle One)	Multi- plier	Score	Max. Score	Ref. (Section)	
<b>1</b> Observed Release	0      45	1	0	45	5.1	
Date and Location:						
Sampling Protocol:						
If line <b>1</b> is 0, the $S_3 = 0$ . Enter on line <b>5</b> .						
If line <b>1</b> is 45, then proceed to line <b>2</b> .						
<b>2</b> Waste Characteristics					5.2	
Reactivity and Incompatibility	0 1 2 3	1		3		
Toxicity	0 1 2 3	3		9		
Hazardous Waste Quantity	0 1 2 3 4 5 6 7 8	1		8		
Total Waste Characteristics Score				20		
<b>3</b> Targets					5.3	
Population Within 4-Mile Radius	0 9 12 15 18 21 24 27 30	1		30		
Distance to Sensitive Environment	0 1 2 3	2		6		
Land Use	0 1 2 3	1		3		
Total Targets Score				39		
<b>4</b> Multiply <b>1</b> x <b>2</b> x <b>3</b>				35.100		
<b>5</b> Divide line <b>4</b> by 35.100 and multiply by 100				$S_3 =$ 0		

AIR ROUTE WORK SHEET

	s	s <sup>2</sup>
Groundwater Route Score (S <sub>gw</sub> )	21.22	450.48
Surface Water Route Score (S <sub>sw</sub> )	4.20	119.03
Air Route Score (S <sub>a</sub> )	0	0
$S_{gw}^2 + S_{sw}^2 + S_a^2$		569.51
$\sqrt{S_{gw}^2 + S_{sw}^2 + S_a^2}$		23.86
$\sqrt{S_{gw}^2 + S_{sw}^2 + S_a^2} / 1.73 = S_M =$		13.79

WORKSHEET FOR COMPUTING S<sub>M</sub>